**Municipality/Organization: Hanscom Air Force Base** 

**EPA NPDES Permit Number: MAR042029** 

**MaDEP Transmittal Number: W-041288** 

**Annual Report Number** 

**& Reporting Period:** No. 4: 1 May 06 – 30 April 07

# NPDES PII Small MS4 General Permit Annual Report

#### Part I. General Information

Contact Person: DONALD C. MORRIS, PE

Title: Environmental Director

Telephone #: 781-377-2475 Email: Donald.morris@hanscom.af.mil

#### **Certification:**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

| Signature:  |  |
|---|--|
| Printed Name: CHRIS PERKINS, PE                     |  |
| Title: Base Civil Engineer, Government Organization |  |
| Date: 30 April 2007                                 |  |

### Part II. Self-Assessment

Hanscom Air Force Base (AFB) has completed the required self-assessment and has determined that our base is in compliance with all permit conditions, except for the following provisions:

Part IV.B.1 Hanscom AFB did not provide educational displays and notices but will accomplish this BMP in the year 5 cycle.

Part IV.B.3 Hanscom AFB did not sample and analyze stormwater during the reporting year due to limited funds. Year 5 sampling and analysis funds are available and this BMP will be performed.

## Part III. Summary of Minimum Control Measures

### 1. Public Education and Outreach

| BMP<br>ID#      | BMP Description                    | Responsible<br>Dept./Person<br>Name | Measurable Goal(s)                     | Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)  | Planned Activities –<br>Permit Year 5  |
|-----------------|------------------------------------|-------------------------------------|--|---|--|
| 3.1a<br>Revised | Partnering w/Massport, Towns       | 66 MSG/CEV                          | 1 partnering event per<br>year         | Meeting with Massport and DEP was held on 7 June 06, 19 Jan and 23 April 07. Storm water improvements hearing 15 Feb 07 with Bedford Conservation Commission on building construction near Shawsheen River.                                 | Complete similar effort.   |
| 3.1b<br>Revised | Partnering w/Base<br>Organizations | 66 MSG/CEV                          | 1 partnering event per year            | Multiple undocumented meetings with all levels of Roads & Grounds Department. All projects under design by Air Force Civil Engineering are documented for stormwater review using AF Form 813.  | Complete similar effort and document more formal meeting with managers, foremen. |
| 3.1c<br>Revised | Educational Materials,<br>Base     | 66 MSG/CEV                          | Pamphlets, flyers, electronic messages | Wetland bird pamphlet was distributed to Boy and Cub Scouts on base. Canoe trip for 8 <sup>th</sup> graders and marine ecosystem field trip for 6 <sup>th</sup> graders. Shawsheen River cleanup e-mail on 20 April 07.                     | Complete similar effort.   |
| 3.1d<br>Revised | Educational Displays,<br>Notices   | 66 MSG/CEV                          | 1 display event per<br>year            | None.   | Improve effort to accomplish this BMP.   |
| 3.1e<br>Revised | Pollution Prevention<br>Events     | 66 MSG/CEV                          | 1 P2 event per week                    | Hazardous Household Waste and<br>Materials Drop-off Day are held each<br>week, on Tuesday at 8-9 AM. Housing<br>contractor has sponsored separate<br>collection events on Sundays. New<br>collection booms installed in<br>Shawsheen River. | Complete similar effort  |
| Revised         |                                    |                                     |  |   |  |

### 1a. Additions

## 2. Public Involvement and Participation

| BMP     | BMP Description    | Responsible  | Measurable Goal(s)    | Progress on Goal(s) –                     | Planned Activities –     |
|---------|--------------------|--------------|-----------------------|---|--------------------------|
| ID#     |                    | Dept./Person |                       | Permit Year4                              | Permit Year 5            |
|         |                    | Name         |                       | (Reliance on non-municipal partners       |                          |
|         |                    |              |                       | indicated, if any)                        |                          |
| 3.2a    | Public Stakeholder | MSG/CEV      | 1 stakeholder meeting | Hanscom AFB and Executive Office of       | Complete similar effort. |
|         | Meeting            | .[           | per year              | Environmental Affairs met to review       |                          |
| Revised |                    |              |                       | water budgets program and process for     |                          |
|         |                    |              |                       | watersheds on 29 Jun 06 and 1 Mar 07.     |                          |
|         | Annual MS4 Public  | MSG/CEV      | 1 notice per year and | A specific MS4 advertisement was not      | Complete similar effort. |
| 3.2b    | Notice             |              | document responses    | performed; however the public was         | _                        |
| Revised |                    |              |                       | informed about storm water                |                          |
|         |                    |              |                       | improvements at Hanscom AFB during        |                          |
|         |                    |              |                       | Bedford and Lincoln Conservation          |                          |
|         |                    |              |                       | Commission public hearings.               |                          |
|         | Oil, Vehicle Fluid | MSG/CEV      | Document distributed  | Info posted on base environmental web     | Complete similar effort. |
| 3.2c    | Disposal Info      |              | info & waste turn-ins | site, in housing info packets and at auto |                          |
| Revised |                    |              |                       | hobby shop.                               |                          |
|         |                    |              |                       | , ,                                       |                          |
|         |                    |              |                       |   |                          |
|         |                    |              |                       |   |                          |
| Revised |                    |              |                       |   |                          |
|         |                    |              |                       |   |                          |
|         |                    |              |                       |   |                          |
|         |                    |              |                       |   |                          |
| Revised |                    |              |                       |   |                          |
|         |                    |              |                       |   |                          |
|         |                    |              |                       |   |                          |
|         |                    | -            |                       |   |                          |
| Revised |                    |              |                       |   |                          |
|         |                    |              |                       |   |                          |

### 2a. Additions

## 3. Illicit Discharge Detection and Elimination

| BMP<br>ID#      | BMP Description                                 | Responsible<br>Dept./Person<br>Name | Measurable Goal(s)                          | Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)   | Planned Activities –<br>Permit Year 5  |
|-----------------|---|-------------------------------------|---|--|--|
| 3.3a<br>Revised | Update Storm Water &<br>Sewer Maps on CAD       | 66 MSG/CE                           | Update as changes occur.                    | Weekly meetings with implementing contractor document updating as changes occur. New GIS includes stormwater infrastructure data.  | Complete similar effort.               |
| 3.3b<br>Revised | Inspect Sewer By-pass<br>Valve, Train Personnel | 66 MSG/CE                           | Sewer valves operate, zero sewer discharge. | Training of implementing contractor is performed continuously. Sewer force main inspections and meetings with MWRA, Bedford and Lexington to address excessive wear in pipe. | Complete similar effort.               |
| 3.3c<br>Revised | Inspect, Clean<br>Oil/Water Separators          | 66MSG/CE                            | Document conditions, verify connections     | All base oil/water separators were cleaned on 25-27 Oct 06 and documented in a report. Oil/water separators at Car Wash and Snow Barn cleaned on 17-18 Nov 06.               | Complete similar effort.               |
| 3.3d<br>Revised | Inspect for Non-Storm<br>Water Connections      | 66 MSG/CE                           | Document findings, eliminate connections    | Inspection program identified several indirect connections from condensate return line into stormwater catch basins. All were fixed.   | Complete similar effort.               |
| 3.3e<br>Revised | Sample, Analyze Storm<br>Water                  | 66 MSG/CEV                          | Sample 2 events per year                    | Visual inspections for pollutants were routinely performed but no stormwater sampling was performed.   | Improve effort to accomplish this BMP. |
| Revised         |   |                                     |   |  |  |

### 3a. Additions

### 4. Construction Site Storm water Runoff Control

| BMP<br>ID#      | BMP Description                     | Responsible<br>Dept./Person<br>Name | Measurable Goal(s)                           | Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)  | Planned Activities –<br>Permit Year 5 |
|-----------------|-------------------------------------|-------------------------------------|--|---|---------------------------------------|
| 3.4a<br>Revised | Stabilize Drainage,<br>Exposed Soil | 66 MSG/CEV                          | Approve construction P2 plans, inspect sites | P2 plans for most small and all large construction sites (CE Heavy Repair Facility and Fitness Center) were reviewed and compliance assured.  | Complete similar effort.              |
| 3.4b<br>Revised | Sediment Control                    | 66 MSG/CEV                          | Inspect before, during and after             | Government and implementing contractor continuously inspected construction sites on base. Extra emphasis and success in installing hay bales and silt fence at temporary soil piles and redevelopment sites.        | Complete similar effort.              |
| 3.4c<br>Revised | Protect Wetlands,<br>Buffer Zones   | 66 MSG/CEV                          | Approve staging, storage, access             | Kept and used backup supply of hay bales for quick fixes and installed additional downstream catch basin fabric. Construction in base housing area involved extensive wetland protection materials.                 | Complete similar effort.              |
| 3.4d<br>Revised | Sequence Construction<br>Activity   | 66 MSG/CEV                          | Approve job sequence, minimize impact        | Hanscom AFB participation in housing privatization contract planning resulted in project phasing and design of flow control device and low impact development BMPs. Redeveloped site was phased to minimize exposed | Complete similar effort.              |
| 3.4e<br>Revised | Implement Good Housekeeping         | 66 MSG/CEV                          | No-notice site inspections                   | Site inspection at CE Heavy Repair<br>Facility in March 07 resulted in<br>improved housekeeping prior to heavy<br>rains.  | Complete similar effort.              |
| Revised         |                                     |                                     |  |   |                                       |

### 4a. Additions

## **5. Post-Construction Storm Water Management in New Development and Redevelopment**

| BMP<br>ID#      | BMP Description         | Responsible<br>Dept./Person<br>Name | Measurable Goal(s)                        | Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)   | Planned Activities –<br>Permit Year 5 |
|-----------------|-------------------------|-------------------------------------|---|--|---------------------------------------|
| 3.5a<br>Revised | Structural Controls     | 66 MSG/CE                           | Design to 5 year<br>watershed action plan | CE Heavy Repair Facility design will result in 12% reduction in runoff and 10% increased groundwater recharge. Structural BMP project to raise catch basins and install Stormceptor device will add ~3.5 acre-feet of detention. | Complete similar effort.              |
| 3.5b<br>Revised | Non-Structural Controls | 66 MSG/CEV                          | Link Watershed goals<br>to planning       | Planning process now includes storm water element maximizing progress toward flow & recharge targets   | Complete similar effort.              |
| 3.5c<br>Revised | Natural Controls        | 66 MSG/CEV                          | Maintain vegetation buffers               | Existing buffers were improved by maintaining no-cut zones base wide and reducing grass cutting in many areas.   | Complete similar effort.              |
| Revised         |                         |                                     |   |  |                                       |
| Revised         |                         |                                     |   |  |                                       |
|                 |                         |                                     |   |  |                                       |

| Revised |               |  |  |  |  |  |  |
|---------|---------------|--|--|--|--|--|--|
| 5a. Ac  | 5a. Additions |  |  |  |  |  |  |
|         |               |  |  |  |  |  |  |
|         |               |  |  |  |  |  |  |
|         |               |  |  |  |  |  |  |

## 6. Pollution Prevention and Good Housekeeping in Municipal Operations

| BMP Description                   | Responsible<br>Dept./Person<br>Name   | Measurable Goal(s)  | Progress on Goal(s) – Permit Year 4 (Reliance on non-municipal partners indicated, if any)  | Planned Activities –<br>Permit Year 5  |
|-----------------------------------|---|---|---|--|
| Catch Basin Cleaning              | 66 MSG/CE   | Sweep streets, clean catch basins   | Regular street sweeping after winter sanding and in Spring. Catch basin cleaning greatly improved.  | Sustain sweeping and improved catch basin effort.  |
| Vehicle Wash Controls             | 66 MSG/CEV  | Inspect wash facilities, discharges to sewer  | Inspections performed, New car wash facility design started.  | Complete similar effort.   |
| Organic Runoff<br>Controls        | 66 MSG/CE   | Inspect hydro-seeding, composting areas   | Compost activities improved producing more high quality loam.   | Complete similar effort.   |
| Spill Response<br>Procedure, Plan | 66 MSG/CEV  | Inspect, train, assure on-call spill response   | Spill Response Plan updated Feb 07 and elevated to base level document reviewed and approved by Commander.  | Complete similar effort.   |
| Conduct Environmental<br>Audits   | 66 MSG/CEV  | Annual audit & report   | Environmental compliance audit was conducted by 12person team for 5-days (12-16 June 06)  | Complete similar effort. The next compliance audit is scheduled for 7-11 May 07.   |
|                                   | Catch Basin Cleaning  Vehicle Wash Controls  Organic Runoff Controls  Spill Response Procedure, Plan  Conduct Environmental | Dept./Person Name  Catch Basin Cleaning 66 MSG/CE  Vehicle Wash Controls 66 MSG/CEV  Organic Runoff 66 MSG/CE  Spill Response 66 MSG/CEV  Procedure, Plan  Conduct Environmental 66 MSG/CEV | Catch Basin Cleaning  66 MSG/CE  Sweep streets, clean catch basins  Vehicle Wash Controls  Organic Runoff Controls  66 MSG/CE  Inspect wash facilities, discharges to sewer  Inspect hydro-seeding, composting areas  Spill Response Procedure, Plan  66 MSG/CEV  Inspect, train, assure on-call spill response  Conduct Environmental  66 MSG/CEV  Annual audit & report | Dept./Person Name  Catch Basin Cleaning  66 MSG/CE  Vehicle Wash Controls  Organic Runoff Controls  Spill Response Permit Year 4 (Reliance on non-municipal partners indicated, if any)  Regular street sweeping after winter sanding and in Spring. Catch basin cleaning greatly improved.  Inspect wash facilities, discharges to sewer  Inspect hydro-seeding, composting areas  Compost activities improved producing more high quality loam.  Spill Response Procedure, Plan  66 MSG/CEV  Inspect, train, assure on-call spill response  Conduct Environmental Audits  Annual audit & report Audits  Permit Year 4 (Reliance on non-municipal partners indicated, if any)  Regular street sweeping after winter sanding and in Spring. Catch basin cleaning greatly improved.  Inspect wash facilities, discharges to sewer  Spill Response Plan updated Feb 07 and elevated to base level document reviewed and approved by Commander.  Environmental compliance audit was conducted by 12person team for 5-days |

| Revised |               |  |  |  |  |  |
|---------|---------------|--|--|--|--|--|
| 6a. A   | Sa. Additions |  |  |  |  |  |
|         |               |  |  |  |  |  |
|         |               |  |  |  |  |  |

#### 7. BMPs for Meeting Total Maximum Daily Load (TMDL) Waste Load Allocations (WLA)

Part I.B.2 (1) A TMDL has been established but not approved by the EPA. The TMDL Report MA83-08-2003-01, dated 9 June 2003, DWM Control Number CN: 168.00 is for Segment MA83-08 of the Shawsheen River. The Storm Water Pollutant TMDL identifies storm water pollutants (sediment as reflected in suspended solids, metals, excessive storm water flow rates and insufficient stream flow rates) as impairing aquatic life uses and impacting river habitat. Implementing BMPs addressing storm water detention and groundwater recharge over several years is required however measurable progress is being achieved.

During a 23 April 2007 meeting at Hanscom Field between the Air Force, Massport, DEP and EPA it was agreed that the Air Force and Massport will submit a formal request to the EPA to change the impaired segment on the Clean Water Act 303(d) list of impaired waters from Category 5 to Category 4b. This new direction in achieving water quality goals stresses management by schedule and a mutually agreeable enforcement mechanism which may include the MS4 Permit.

<<i f applicable>> NOT APPLICABLE

| BMP<br>ID# | BMP Description | Responsible<br>Dept./Person | Measurable Goal(s) | Progress on Goal(s) –<br>Permit Year 4                 | Planned Activities –<br>Permit Year 5 |
|------------|-----------------|-----------------------------|--------------------|--|---------------------------------------|
|            |                 | Name                        |                    | (Reliance on non-municipal partners indicated, if any) |                                       |
|            |                 |                             |                    | NO APPROVED TMDL                                       |                                       |
| Revised    |                 |                             |                    |  |                                       |
|            |                 |                             |                    |  |                                       |

| Revised |          |  |  |
|---------|----------|--|--|
|         |          |  |  |
| Revised |          |  |  |
|         |          |  |  |
| Revised |          |  |  |
|         |          |  |  |
| Revised |          |  |  |
|         |          |  |  |
| Revised |          |  |  |
| 7a. A   | dditions |  |  |
|         |          |  |  |
|         |          |  |  |

#### 7b. WLA Assessment

#### Part IV. Summary of Information Collected and Analyzed

The Air Force has funded the operation of a stream gage by the U.S. Geological Survey (USGS) for over 10 years. The stream gage is located on the Shawsheen River between Hanscom Air Force Base and Hanscom Field. It continuously monitors and records flow and analytical water quality data. The USGS will present a summary of the data collected to the EPA, DEP, Air Force and Massport during the summer of 2007. This information, especially the hydrograph will be used to assess the effectiveness of flow control structural BMPs installed over the past 4 years.

#### Part V. Program Outputs & Accomplishments (OPTIONAL)

The Air Force at Hanscom AFB has obtained funding to install additional structural BMPs to address the need to reduce peak flows and increase groundwater recharge to improve base flows. In FY06 a \$86,000.00 project was awarded to raise the invert elevation of 13 existing stormwater catch basins. This will create approximately 3.5 acre-feet of detention and potential groundwater recharge. The project also includes the installation of one new Stormceptor type catch basin at one of the outfalls to the Shawsheen River. This will improve water quality entering the river from one of the industrial areas on the base.

In FY07, additional funding in the amount of \$100,000.00 was obtained for another stormwater program project to construct a water quality swale and flow control/recharge basin. This project will affect approximately 4 acres of paved surface at the base motor pool and will result in significant pollutant removal, increased groundwater recharge and a reduction in peak flow.

In 2007 a 2-acre impervious heavy equipment site was demolished and is being redeveloped for the same use. The new design reduces the impervious area by 10%, increases groundwater recharge and expands a vegetated buffer area between the pavement and an existing wetland.

### **Programmatic**

| Storm water management position created/staffed               | (y/n) | Y          |
|---|-------|------------|
| Annual program budget/expenditures                            | (\$)  | ~\$110.0 K |
| Total program expenditures since beginning of permit coverage | (\$)  | ~\$870.0 K |
| Funding mechanism   |       | Congress   |

#### **Education, Involvement, and Training**

| Estimated number of residents reached by education program(s)           | (# or %)     | 2,500        |  |
|---|--------------|--------------|--|
| Storm water management committee established                            | (y/n)        | N            |  |
| Stream teams established or supported                                   | (# or y/n)   | Y, Shawsheen |  |
| Shoreline clean-up participation or quantity of shoreline miles cleaned | (y/n or mi.) | Y, 0.5 mi.   |  |
| Household Hazardous Waste Collection Days                               |              |              |  |
| <ul> <li>days sponsored</li> </ul>                                      | (#)          | 56           |  |

| <ul><li>community participation</li></ul> | (%)           | 35%      |
|---|---------------|----------|
| <ul> <li>material collected</li> </ul>    | (tons or gal) | 3.3 tons |
| School curricula implemented              | (y/n)         | N        |
|   |               |          |
|   |               |          |

## Legal/Regulatory

|  | In Place<br>Prior to | Under  |         |         |
|--|----------------------|--------|---------|---------|
|  | Phase II             | Review | Drafted | Adopted |
| Regulatory Mechanism Status (indicate with "X")    |                      |        |         |         |
| Illicit Discharge Detection & Elimination          | X                    |        |         |         |
| Erosion & Sediment Control                         |                      |        |         | X       |
| Post-Development Storm water Management            |                      |        |         | X       |
| Accompanying Regulation Status (indicate with "X") |                      |        |         | ·       |
| Illicit Discharge Detection & Elimination          |                      |        |         | X       |
| Erosion & Sediment Control                         |                      |        |         | X       |
| Post-Development Storm water Management            |                      |        |         | X       |

## **Mapping and Illicit Discharges**

| Outfall mapping complete               | (%)        | 100 |
|--|------------|-----|
| Estimated or actual number of outfalls | (#)        | 12  |
| System-Wide mapping complete           | (%)        | 100 |
| Mapping method(s)                      |            |     |
| <ul><li>Paper/Mylar</li></ul>          | (%)        | 100 |
| ■ CADD                                 | (%)        | 100 |
| • GIS                                  | (%)        | 50  |
| Outfalls inspected/screened            | (# or %)   | 100 |
| Illicit discharges identified          | (#)        | 0   |
| Illicit connections removed            | (#)        | 0   |
|  | (est. gpd) |     |

| % of population on sewer          | (%) | 100 |
|-----------------------------------|-----|-----|
| % of population on septic systems | (%) | 0   |
|                                   |     |     |
|                                   |     |     |

### Construction

| Number of construction starts (>1-acre)   | (#)        | 2    |
|---|------------|------|
| Estimated percentage of construction starts adequately regulated for erosion and sediment control | (%)        | 100% |
| Site inspections completed  | (# or %)   | 100% |
| Tickets/Stop work orders issued   | (# or %)   | 1    |
| Fines collected   | (# and \$) | 0    |
| Complaints/concerns received from public  | (#)        | 0    |
|   |            |      |
|   |            |      |

## **Post-Development Storm Water Management**

| Estimated percentage of development/redevelopment projects adequately regulated for post- | (%)      | 100 |
|---|----------|-----|
| construction storm water control  |          |     |
| Site inspections (for proper BMP installation & operation) completed                      | (# or %) | 100 |
| BMP maintenance required through covenants, escrow, deed restrictions, etc.               | (y/n)    | N   |
| Low impact development (LID) practices permitted and encouraged                           | (y/n)    | Y   |
|   |          |     |

## **Operations and Maintenance**

| Average frequency of catch basin cleaning (non-commercial/non-arterial streets)                | (times/yr)     | 0.5     |
|--|----------------|---------|
| Average frequency of catch basin cleaning (commercial/arterial or other critical streets)      | (times/yr)     | 0.5     |
| Qty of structures cleaned  | (#)            | 318     |
| Qty of storm drain cleaned   | (LF or mi.)    | 0       |
| Qty. of screenings/debris removed from storm sewer infrastructure                              | (lbs. or tons) | 20 tons |
| Disposal or use of sweepings (landfill, POTW, compost, recycle for sand, beneficial use, etc.) |                | recycle |

| Basin Cleaning Costs   |                     |           |
|--|---------------------|-----------|
| Annual budget/expenditure (labor & equipment)  | (\$)                | 8.0 K     |
| Disposal cost  | (\$)                | 0         |
|  |                     |           |
| Average frequency of street sweeping (non-commercial/non-arterial streets)             | (times/yr)          | 15        |
| Average frequency of street sweeping (commercial/arterial or other critical streets)   | (times/yr)          | 15        |
| Qty. of sand/debris collected by sweeping  | (lbs. or tons)      | 20 tons   |
| Disposal of sweepings (landfill, POTW, compost, beneficial use, etc.)                  | (location)          | Compost   |
| Cost of sweepings disposal   | (\$)                | 0         |
| Vacuum street sweepers purchased/leased  | (#)                 | 0         |
| Vacuum street sweepers specified in contracts  | (y/n)               | Y         |
|  |                     |           |
|  |                     |           |
|  |                     |           |
| Reduction in application on public land of: ("N/A" = never used; "100%" = elimination) |                     |           |
| <ul> <li>Fertilizers</li> </ul>  | (lbs. or %)         | decreased |
| <ul><li>Herbicides</li></ul>   | (lbs. or %)         | decreased |
| <ul> <li>Pesticides</li> </ul>   | (lbs. or %)         | decreased |
|  |                     |           |
|  |                     |           |
|  | ·                   |           |
| Anti-/De-Icing products and ratios   | % NaCl              | 25%       |
|  | % CaCl <sub>2</sub> | 0         |
|  | % MgCl <sub>2</sub> | 0         |
|  | % CMA               | 0         |
|  | % Kac               | 0         |
|  | % KCl               | 0         |
|  | % Sand              | 75%       |
| Pre-wetting techniques utilized  | (y/n)               | Y         |
| Manual control spreaders used  | (y/n)               | Y         |
| Automatic or Zero-velocity spreaders used  | (y/n)               | N         |
| Estimated net reduction in typical year salt application                               | (lbs. or %)         | -2%       |
| Salt pile(s) covered in storage shed(s)  | (y/n)               | Y, 100%   |

| Estimated net reduction or increase in typical year sand application rate | (+/-lbs/ln mi | -2% |
|---|---------------|-----|
|   | or %)         |     |
| Storage shed(s) in design or under construction                           | (y/n)         | N   |
|   |               |     |